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14 *Attorneys for Defendants*  
15 REGAL CINEMAS, INC., REGAL COLONNADE  
16 and REGAL ENTERTAINMENT GROUP

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DAVID BOGLE,  
Plaintiff,

vs.  
REGAL CINEMAS, INC., REGAL  
COLONNADE, REGAL ENTERTAINMENT  
GROUP, DOES I through X, inclusive, and  
ROE CORPORATIONS I through X, inclusive,

Defendants.

CASE NO. 2:22-cv-1054

**DEFENDANTS REGAL CINEMAS,  
INC., REGAL COLONNADE AND  
REGAL ENTERTAINMENT  
GROUP'S PETITION FOR  
REMOVAL TO FEDERAL COURT**

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**DEFENDANTS REGAL CINEMAS, INC., REGAL COLONNADE AND REGAL  
ENTERTAINMENT GROUP'S PETITION FOR REMOVAL TO FEDERAL COURT**

21 Defendants REGAL CINEMAS, INC., REGAL COLONNADE and REGAL  
22 ENTERTAINMENT GROUP ("Defendants"), by and through their attorneys of record,  
23 THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER, hereby remove Case  
24 Number A-22-853465-C from the Eighth Judicial District Court for Clark County, Nevada to the  
25 United States District Court for the District of Nevada pursuant to 28 United States Code  
26 sections 1441 and 1332. A true and correct copy of the Complaint is attached hereto as Exhibit  
27 A.

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On June 22, 2022, Plaintiff DAVID BOGLE filed a Complaint in the Eighth Judicial District for Clark County Nevada, alleging a premises liability negligence claim. Plaintiff alleges he was a resident of Clark County, Nevada. Defendant REGAL CINEMAS, INC. is a Tennessee Corporation with its principal place of business in Knoxville, Tennessee and Defendant REGAL ENTERTAINMENT GROUP is a Delaware Corporation with its principal place of business in Knoxville, Tennessee. Upon information and belief, Defendant REGAL COLONNADE is not an actual corporate entity and has no principal place of business.

This Petition is timely because Defendant REGAL CINEMAS, INC. was served on June 10, 2022 by personal service, Defendant REGAL ENTERTINAMENT GROUP was served on June 13, 2022 by personal service and Plaintiff dropped off a Summons and Complaint at the REGAL COLONNADE physical theater located in Las Vegas, Nevada on June 14, 2022; however, REGAL COLONNADE is not a legal entity. Defendants are informed and believe, based upon Plaintiff's Complaint, his pre-litigation documentation asserting \$39,604.29 in past medical specials, his pre-suit settlement demand for insurance policy limits, the Plaintiff's claim for pain and suffering and alleged ongoing treatment; that there is over \$75,000.00 in controversy.

DATED this 5th day of July 2022.

# THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER

*/s/ Michael C. Hetey, Esq.*  
MICHAEL C. HETEY, ESQ.  
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1100 East Bridger Avenue  
Las Vegas, Nevada 89101  
*Attorneys for Defendants*  
*REGAL CINEMAS, INC., REGAL COLONNADE*  
*and REGAL ENTERTAINMENT GROUP*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 5th day of July 2022, service of the above and foregoing **DEFENDANTS REGAL CINEMAS, INC., REGAL COLONNADE AND REGAL ENTERTAINMENT GROUP'S PETITION FOR REMOVAL TO FEDERAL COURT** was made upon each of the parties by placing a true and correct copy thereof in a sealed envelope placed in the United States Mail, postage pre-paid and addressed as follows.

G. Oliver Melgar, Esq.  
REVOLUTIONARY LAW  
711 South 6th Street, Suite 725  
Las Vegas, NV 89101  
(702) 255-5552

/s/ Jennifer Hodge  
An employee of THORNDAL ARMSTRONG  
DELK BALKENBUSH & EISINGER